



March 14, 2005

Mr. Kamyar Guivetchi
Mr. Paul Dabbs
Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236

Re: Comments on Draft California Water Plan Highlights

Dear Messrs. Guivetchi and Dabbs:

Environmental Defense appreciates the opportunity to comment on the draft version of the B160 Highlights document. We recognize and appreciate the significant efforts of DWR staff to create a document that represents the perspectives of a wide-array of stakeholders.

First, it is important to recognize that the inclusion of three alternative future scenarios, in this Plan, rather than a single "snapshot" approach, is a significant improvement on past Plans. It appears, however, that the text of the Highlights document is not entirely consistent with this approach. For example, the statement, "Urban water demand will increase, especially in the southern part of the state where population growth is greatest", does not appear to be true in all scenarios. We suggest changing it to "Meeting urban water demand will pose significant challenges, especially in the southern part of the state where the most significant population growth is expected." Similarly, though population growth is anticipated under all scenarios, some uncertainty should be acknowledged. We suggest changing the statement on page 4 that the population "will grow to 48 million" to state that the population "is projected to grow to 48 million."

In addition, we are concerned with the following mischaracterizations in the Highlights document:

- (Page 3) "Water made available for the environment is curtailed sharply in these years" should be changed to "The environment is particularly challenged during dry years when less water is left in rivers and streams." The distinction may be subtle, but the latter version reminds the reader that the water was in the environment in the first place.
- (Page 4) The statement "facilitate environmentally and economically sound transfers..." would be improved if changed to "encourage willing sellers and buyers to participate in environmentally and economically sound transfers..." It is always helpful to remind readers that transfers, which are sometimes controversial, are agreements executed between willing sellers and buyers.
- (Page 17) The statement "The CALFED program proposes actions to...develop additional water storage" should be restated as "...develop additional groundwater and surface storage." Readers need to be reminded that groundwater storage, even if they cannot see it, is real.

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Thank you for considering these suggestions, which we believe will result in a document that is much more accurate and effective overall. We look forward to reviewing the public review draft of Bulletin 160.

Sincerely,

A handwritten signature in dark ink, appearing to read "Ann Hayden". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Ann Hayden

Water Resource Analyst